

April 11, 2014

MEMORANDUM

SUBJECT: Review - Draft Documentation of Financial Assurance ¹

Facility: MRP Properties Company, LLC
Refinery - Arkansas City, KS
EPA ID # KSD 087 418 695

FROM: Michael Lancaster 
Financial Analyst - SEE Grantee
AWMD/WEMM

TO: Brad Roberts
Project Officer
AWMD/WEMM

FINDINGS:

A review of the last year's financial assurance documentation submitted by Valero Energy on behalf of its subsidiary MRP Properties shows that the Corporate Guarantee and the Financial Test do not make reference to Corrective Action.

¹ Part II RCRA Permit III.P

RCRA



532359

MRP Properties Company, LLC

Post Office Box 696000 • San Antonio, Texas 78269-6000 • Telephone (210) 345-2000

Brenda B. Epperson
Manager

Environmental Liability & Remediation Management

February 5, 2014

U.S. Environmental Protection Agency, Region 7
Air and Waste Management Division
RCRA Corrective Action & Permits Branch
ATTN: Brad Roberts, P.G.
11201 Renner Boulevard
Lenexa, Kansas 66219


Re: **Draft Documentation of Financial Assurance**
Part II Permit, III.P.
MRP Properties Company, LLC – Arkansas City, Kansas
EPA ID No. KSD087418695

Dear Mr. Roberts:

MRP Properties Company, LLC (MRP) is submitting the enclosed draft documentation of financial assurance for approval in accordance with the Part II Permit, Condition III.P. The draft financial assurance information includes the 10-year cost associated with for Interim Measure Operation and Maintenance (IMOM) Plan and the estimated 30-year cost for the groundwater sampling and analysis plan (SAP) submitted to the EPA and approved on January 2, 2014. In addition, a copy of last year's financial assurance documentation is attached. The same format will be used for the current financial assurance documentation to be submitted March 2014.

If you have any questions or comments regarding this information please contact me at 210-345-4619.

Sincerely,


Brenda B. Epperson

Enclosures via email

cc: Mostafa Kamal, KDHE BWM
Kent Biggerstaff – MRP Properties Company, LLC
Jay Mednick – MWH